

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN**

---

**GREGORY BOYER**, as Administrator of the  
Estate of Christine Boyer, and on his own behalf,

Plaintiff,

v.

Lead Case No. 20-CV-1123

**ADVANCED CORRECTIONAL  
HEALTHCARE, INC., et al.,**

Defendants.

---

**GREGORY BOYER**, as Administrator of the  
Estate of Christine Boyer, and on his own behalf,

Plaintiff,

v.

Case No. 22-CV-723

**USA MEDICAL & PSYCHOLOGICAL  
STAFFING, et al.,**

Defendants.

---

**JOINT MOTION TO CLARIFY AND AMEND BRIEFING SCHEDULE**

---

The parties, by their respective counsel, jointly move the Court for an order clarifying and amending the briefing schedules for the pending dispositive motions (ECF Dkt. Nos. 234, 239 and 250 (Case No. 20-CV-1123)). The parties advise the Court and jointly propose as follows:

1. The Court's Amended Scheduling Order established the summary judgment motion filing deadline of February 14, 2025 and provided for a "28/14 response/reply briefing [schedule]." (ECF Dkt. 198 at 1). Per that schedule, briefs in opposition to motions filed

February 14 would be filed by **March 14, 2025** and reply briefs would be filed by **March 28, 2025**.

2. The County Defendants and USA Medical Defendants filed and served dispositive motions on February 14. (ECF Dkt. Nos. 234 and 239 et seq.) The electronic filing system acknowledgement of filing of those motions included “Docket Text” stating the briefs in opposition would be due March 7, 2025 and reply briefs would be due March 17, 2025. (Id.)

3. The Advanced Correctional Defendants served their dispositive motion and all supporting materials on February 14 and, due to unavailability of the electronic filing system the evening of February 14, completed filing of their supporting materials on February 16. (ECF Dkt. No. 250 et seq.; *see* ECF Dkt. No. 262). Defendants on February 17 filed a Motion to Extend Summary Judgment Deadline to permit Timely Filing of their dispositive motion and supporting materials. (ECF Dkt. No. 262). On Wednesday, February 20, 2025, the Magistrate Judge granted the motion to extend time (ECF Dkt. No. 262) and reset the deadlines associated with that motion to response briefs in opposition by March 10, 2025 and reply briefs by March 20, 2025. (ECF Dkt. No. 266 (Text Order, 2/19/2025)).

4. The parties conferred Wednesday, February 20, and agreed to seek clarification and simplification of the various deadlines. They are in the midst of expert discovery and had planned that discovery and their schedules, as best they were able, around the briefing schedule set by the Amended Scheduling Order, i.e., briefs in opposition filed by **March 14, 2025** and reply briefs filed by **March 28, 2025**.

5. As such, the parties seek clarification of the summary judgment briefing schedule, and with leave of the Court, a modest extension of the briefing schedule to accommodate counsel’s workload and trial conflicts as follows:

a. Plaintiff's counsel will be deposing five of Defendants' disclosed experts over the next four weeks. The experts are medical professionals and had limited availability, and none had availability before the dispositive motion deadline. The undersigned attorney for plaintiff is also responding to two separate motions for summary judgment in two unrelated cases that have the same deadline of February 21, 2025. *See Wiley v. Wexford Health Sources, Inc. et al*, 3:21-cv-00599-DWD (SDIL) and *Reed et al v. Wexford Health Sources, Inc. et al*, 3:20-cv-01139-SPM (SDIL). In addition to that upcoming deadline, Plaintiffs attorney will be required to travel to Washington, DC for a court obligation in another matter on March 3, 2025. Additionally, one of Plaintiff's attorneys, Jon Loevy, is currently in trial that is likely to go beyond next week. *See Fulton v. Bartik et al.*, Case Nos. 20 C 3118 (N.D. Ill.) & *Mitchell v Bartik, et al.*, 20 C 3119 (N.D. Ill.).

b. County Defendants' counsel, Attorney Andrew Jones, is scheduled to be in trial in this Court on the matter titled, *Davis v. Allen*, 21-cv-565-wmc, the week of March 17, 2025 and out of state on vacation from April 2 to 13, 2025.

6. Based on these planning and workload considerations, and in recognition of the significance of the issues presented here and, with deference to the Court's considerable workload, the parties jointly request that the Court permit briefs in opposition to the pending motions to be filed by **March 28, 2025** and reply briefs to be filed by **April 18, 2025**.

Dated this 20th day of February, 2025.

**LEIB KNOTT GAYNOR LLC**

By: /s/ Douglas S. Knott  
Douglas S. Knott, SBN 1001600  
Daniel A. Kafka, SBN 1122144  
Attorneys for Advanced Correctional Healthcare,  
Inc., Lisa Pisney and Amber Fennigkoh  
219 N. Milwaukee Street, Suite 710  
Milwaukee, WI 53202  
T: (414) 276-2102 | F: (414) 276-2140  
Email: [dknott@lkglaw.net](mailto:dknott@lkglaw.net)  
[dkafka@lkglaw.net](mailto:dkafka@lkglaw.net)

**GERAGHTY O'LOUGHLIN & KENNEY, P.A.**

By: /s/ John B. Casserly  
John B. Casserly, SBN 1026968  
Attorneys for USA Medical & Psychological  
Staffing, S.C., Norman Johnson, Travis Schamber,  
Wesley Harmston & Jillian Bresnahan  
Wells Fargo Place, 27<sup>th</sup> Floor  
30 East Seventh Street  
Saint Paul, Minnesota 55101  
T: (651)-291-6437 | F: (651) 291-9477  
Email: [jcasserly@goklawfirm.com](mailto:jcasserly@goklawfirm.com)

**HANSEN REYNOLDS LLC**

By: /s/ Andrew A. Jones  
Andrew A. Jones, SBN 1023074  
Attorneys for Monroe County, Stan Hendrickson,  
Danielle Nelson & Shasta Moga  
301 N. Broadway, Suite 400  
Milwaukee, WI 53202  
T: (414) 455-7676 | F: (414) 273-8476  
Email: [ajones@hansenreynolds.com](mailto:ajones@hansenreynolds.com)

**LOEVY & LOEVY**

By: /s/ Maria Makar

Maria Makar, SBN 5655444

Jon Loevy, SBN 6218254

Attorneys Plaintiff

311 North Aberdeen Street

Chicago, IL 60607

T: (414) 276-2102 | F: (414) 276-2140

Email: [makar@loevy.com](mailto:makar@loevy.com)

[jon@loevy.com](mailto:jon@loevy.com)